

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** : Chapter 13  
**Tavani, Peter E.**  
**Debtors/ Respondents** : 19-10709

**Answer to Motion of  
For Relief from Automatic Stay**

Debtor, Peter E. Tavani, by and through his undersigned attorney, hereby provides the following answers to the Motion for Relief from Stay filed by Santander Consumer USA, Inc. ("Santander" and/or "Movant"). These responses are made without prejudice to debtor's right to present additional facts or contentions at trial based upon information hereinafter obtained or evaluated. Debtor specifically reserves the right to supplement or amend his responses or present additional facts and contentions at a later date to any of the answers given.

1. Denied. The averment contained in this Paragraph consists of mischaracterization or summarization of documents that speak for themselves and they are denied as no response is required.

2. The allegation is a legal conclusion of law to which no answer is required.

3. Denied. The averment contained in this Paragraph consists of mischaracterization or summarization of documents that speak for themselves and they are denied as no response is required.

4. Denied. Debtor can neither admit nor deny the allegations because Debtor has no personal knowledge of the accuracy of such statement. Strict proof is hereby demanded.

5. Denied. Debtor can neither admit nor deny the allegations because Debtor has no personal knowledge of the accuracy of such statement. Strict proof is hereby demanded.

6. Denied. By way of further explanation, Debtor's first payment was due on February 9, 2019. According to Debtor and his non-filing spouse, Santander did not send a monthly statement where payments were to be made. that they attempted to contact Santander to make a payment, but Movant would not allow them to make a payment because the Debtor was in a bankruptcy. To date, debtor has not received any statement, a notice of an address where payments are to be sent nor an account number.

7. (a) Denied. The allegation is a legal conclusion of law to which no answer is required. To the extent an answer may be appropriate, the allegations are denied, and the debtor aver, on the contrary, that Debtor incorporates his response to Paragraph 6 above as fully set forth herein.

For the reasons set forth above, among others, and based on this Court's authority under the Bankruptcy Code, the Debtor prays that the motion be denied and such other relief as is just and proper. The Debtor specifically reserves the right to supplement the answer at or prior to the hearing thereon.

Dated: June 25, 2019

"/s/" Mitchell J. Prince  
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